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Attorneys for Defendant and Counterclaimant
SENTIUS INTERNATIONAL, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ZOHO CORPORATION

Plaintiff,

v.

SENTIUS INTERNATIONAL, LLC

Defendant.

SENTIUS INTERNATIONAL, LLC

Counterclaimant,

v.

ZOHO CORPORATION and ZOHO
CORPORATION PVT., LTD.

Counter-Defendants.

Case No: 4:19-cv-00001-YGR

**PATENT L.R. 4-3 JOINT CLAIM
CONSTRUCTION AND PREHEARING
STATEMENT**

Pursuant to Patent L.R. 4-3, Plaintiff and Counter-defendant Zoho Corporation and Counter-defendant Zoho Corporation Pvt., Ltd. (collectively, “Zoho”) and Defendant and Counter-Claimant Sentius International, LLC (“Sentius”), hereby submit this Joint Claim Construction and Prehearing Statement concerning U.S. Patent No. RE 43,633 (hereinafter, the “‘633 patent”) and U.S. Patent No. 7,672,985 (hereinafter, the “‘985 patent”).

I. Patent L.R. 4-3(a): Agreed Constructions

Constructions of terms on which the parties agree are provided in Appendix A.

II. Patent L.R. 4-3(b) & (c): Proposed Constructions of Disputed Terms and Identification of Most Significant Disputed Claim Terms for Construction

Each party’s proposed constructions of disputed terms, together with an identification of intrinsic and extrinsic evidence, are provided in Appendices B and C. Appendix B includes the ten terms that the parties believe to be most significant to resolution of the case and which they propose for construction at this time. Appendix C includes each parties’ proposed construction for the remaining terms currently in dispute. Per the Court’s December 13, 2019 Order (Dkt. 46), the parties do not at this time request construction of these terms, but have included them herein to fully comply with the local rules.

III. Patent L.R. 4-3(d): Anticipated Length of Claim Construction Hearing

The parties anticipate, given the number of patents, claims, and claim terms currently at issue, that three (3) hours will be needed for the claim construction hearing.

IV. Patent L.R. 4-3(e): Witnesses

The parties do not intend to call witnesses during the claim construction hearing.

V. Patent L.R.4-3(f): Factual Findings Requested

Sentius requests factual findings from the Court on the following terms: look-up table, means for compiling the source material image form the at least the plurality of discrete pieces, means for converting the display address of the selected discrete portion to an offset value from the beginning position address and parsing one or more documents (or source documents) to identify at least one term based on at least one (or one or more) rule (or predetermined rules).

1 Zoho requests factual findings regarding the lack of sufficient structure corresponding
2 structure for the means-plus function terms currently in dispute.

3
4 Dated: January 3, 2020

Respectfully submitted,

6 MARTON RIBERA SCHUMANN & CHANG LLP

7 By: /s/ Phillip J. Haack
8 Phillip J. Haack

9 *Attorneys for Plaintiff and Counter-defendant Zoho*
10 *Corporation and Counter-defendant*
11 *Zoho Corporation Pvt., Ltd.*

12
13 Dated: January 3, 2020

Respectfully submitted,

14 CARR & FERRELL LLP

15 By: /s/ Robert J. Yorio
16 Robert J. Yorio

17 *Attorneys for Defendant and Counterclaimant*
18 *SENTIUS INTERNATIONAL, LLC*
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ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I, Phillip J. Haack, attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 3rd day of January 2020, in San Francisco, California.

/s/ Phillip J. Haack

Phillip J. Haack